

EXHIBIT 2

Exhibit 2 – Summary of Defendants’ Disputed Discovery Requests

Request	Short Description	Full Text	Relevance	Undue Burden Identified by Plaintiffs
INT 1	Plaintiffs’ Applications for Admission and Financial Aid	For each Institution to which You applied for admission for a fulltime undergraduate program, state (a) whether You applied early decision, early action, regular decision, and/or as a transfer; (b) whether You were admitted, rejected, waitlisted, admitted off the waitlist, and/or deferred; (c) the categories and amounts of merit- or need-based financial aid for which You applied in each year, whether from an Institution or other third-party (e.g., scholarship); (d) the categories and amounts of financial aid You were awarded (e.g., grant, work-study, loan) in each year, whether from an Institution or other third-party; (e) whether You appealed or requested a modification to the amount of financial aid You were awarded in each year (and if so, whether and how the award was modified); and (f) the amount of Your expected family contribution as determined by that Institution in each year you were awarded financial aid.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Merits – Market Definition • Class certification • Injury • Damages 	None
INT 2	Sources of Financial Aid	Identify all individuals or entities who provided the funding used to pay the costs of Your undergraduate studies (including tuition and fees, room, board, and books and supplies) that were not fully covered by financial aid, and for each such individual or entity state the amount provided by such person by year and the terms on which such funding was provided (e.g., whether the funding was provided to You or on Your behalf as a gift, donation, loan, allowance, or credit, or whether there were any other conditions or requirements on which such funding was provided to You or on Your behalf.	<ul style="list-style-type: none"> • Class certification • Injury • Damages 	None

Request	Short Description	Full Text	Relevance	Undue Burden Identified by Plaintiffs
INT 3	Colleges In Alleged Relevant Market	For each year of the alleged conspiracy, identify by name the specific schools that you contend comprise the relevant market.	<ul style="list-style-type: none"> • Merits – Market Definition 	None
RFP 1	Reasons Plaintiff Applied to an Institution	All Documents Concerning the advantages or disadvantages of applying for admission to any Institution, including Your reasons for applying or not applying to any Institution.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Merits – Market Definition 	None
RFP 2	Applications for Admission	All applications for admission by You to any Institution and Documents Concerning Your application(s) for admission to any Institution, including any decision made by the Institution Concerning Your application.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Merits – Market Definition 	None
RFP 3	Applications for Financial Aid and Supporting Documents	All applications for financial aid for undergraduate education and supporting Documents or information used to complete any such application, including but not limited to tax returns; W-2, 1099s, K-1s, and other tax forms; records of untaxed income; and records of assets.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Class certification • Injury • Damages 	None
RFP 5	Third-Party Scholarships and Financial Aid	Documents sufficient to show the amount and terms of any merit or need-based financial aid You received in connection with Your undergraduate education, including third-party scholarships.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Class certification • Injury • Damages 	None
RFP 6	Financial Aid Declined	Documents sufficient to show the amount and terms of any merit or need-based financial aid You were denied or declined to accept in	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Class certification 	None

Request	Short Description	Full Text	Relevance	Undue Burden Identified by Plaintiffs
		connection with Your undergraduate education, including third-party scholarships.	<ul style="list-style-type: none"> • Injury • Damages 	
RFP 7	College Comparisons and Rankings	All Documents comparing or contrasting two or more Institutions, including any ranking of any Institution.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Merits – Market Definition 	None
RFP 11	Plaintiffs' Involvement in Litigation	All Documents Concerning the circumstances under which You became involved in the Litigation.	<ul style="list-style-type: none"> • Class certification 	None
RFP 12	Engagement Letters, Fee Arrangements	All Documents Concerning Your engagement or retention of counsel in the Litigation, including: (1) Your engagement letter(s) or agreement(s) with Plaintiffs' Counsel or any other counsel for the proposed class in the Litigation; (2) all Documents Concerning who will advance and who is responsible for payment of costs and expenses incurred in connection with the Litigation; and (3) all Documents Concerning who will share in recovery, if any, realized in the Litigation.	<ul style="list-style-type: none"> • Class certification • Damages 	None
RFP 18	Loan Modification and Forgiveness	All Documents Concerning any post-graduation forgiveness or modification of the terms of financial aid that You received, or expect to receive in the future, in connection with Your undergraduate education.	<ul style="list-style-type: none"> • Class certification • Injury • Damages 	None
RFP 19	Satisfaction with Institution and Value of Education	All Documents Concerning your satisfaction or lack thereof with the Institution at which You received Your undergraduate education, including but not limited to Your experiences while attending that Institution or Your view of the value of that education.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Merits – Market Definition 	None

Request	Short Description	Full Text	Relevance	Undue Burden Identified by Plaintiffs
RFP 20	Social Media Usernames	Documents sufficient to Identify all username(s) and email addresses You have used or use on Facebook, Twitter, Reddit, TikTok, Instagram, LinkedIn, or any other social media network.	<ul style="list-style-type: none"> • Merits – Competition/Agreement • Merits – Market Definition • Class certification • Injury • Damages 	None
RFP 21	Social Media Posts About a Plaintiff's Institution	All social media network posts or other communications to or from You Concerning Your undergraduate Institution.	<ul style="list-style-type: none"> • Merits – Competition/Agreement • Merits – Market Definition • Class certification • Injury • Damages 	None
RFP 23	Complaint's Market Definition	All Documents Concerning Your allegation that the relevant market consists of “undergraduate education at private national universities with an average ranking of 25 or higher in the U.S. News & World Report rankings from 2003 through 2021” (Complaint ¶ 241), including all surveys or other documents on which You contend determination of the relevant market is based.	<ul style="list-style-type: none"> • Merits – Market Definition 	None
RFP 24	Tuition and Other Payments	Documents sufficient to show all payments of tuition and fees, room, board, and books and supplies by You or on Your behalf to the Institution at which You received Your undergraduate education, including the identity of all payor(s), dates, and amounts of such payments.	<ul style="list-style-type: none"> • Class certification • Injury • Damages 	None

Request	Short Description	Full Text	Relevance	Undue Burden Identified by Plaintiffs
RFP 25	Loan Agreements	All Documents Concerning student loan agreements relating to Your undergraduate education.	<ul style="list-style-type: none"> • Merits – Competition/ Agreement • Injury • Damages 	None
RFP 26	Loan Payment History	Documents sufficient to show the complete payment history and current balance of any student loans Concerning Your undergraduate education, including any loan forgiveness.	<ul style="list-style-type: none"> • Class certification • Injury • Damages 	None